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July 1, 2021

So ordered, and subject to any restrictions reasonably imposed by PreTrial Services.

BY ECF:

Hon. Alvin K. Hellerstein
District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 14D
New York, NY 10007

/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
7/6/21

RE: United States v. Daniel Torres
Case No.: 21-cr-00132- 2 (AKH)
Request for Modification of Release Conditions

Dear Judge Hellerstein:

As per Your Honor's June 29, 2021 order, I am resubmitting Mr. Torres' request for modification of release conditions with a more definite schedule of notice to the probation officer, times and dates of curfew, and the specific need for curfew.

Specifically, Mr. Torres requests that Your Honor vacate the previous ordered condition that he be subject to home confinement in Your Honor's so-ordered March 11, 2021 appearance bond (ECF No. 41) and in lieu order a seven (7) day curfew permitting him to leave only for work purposes from 8:00 a.m. to 8:00 p.m.

Mr. Torres would like to seek employment utilizing the following services:

Wonolo; <https://www.wonolo.com/>, which is an on-demand staffing marketplace application. It connects businesses which have temporary staffing needs with workers who can meet those needs. Mr. Torres has previously done work for Wonolo

Instacart; <https://www.instacart.com/>, which is an on-demand grocery pick up and delivery service. The service allows customers to order groceries from participating retailers with the shopping being done by a personal shopper.

I would propose that we grant pretrial services access to the two (2) applications, so they can monitor the applications in real time. Alternatively, Mr. Torres also can provide updates to pretrial weekly.

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I have spoken with the Government and pretrial services, and the need for the curfew is to enable Mr. Torres to work during “normal business hours,” while also ensuring that at the end of each “work day” Mr. Torres is accounted for at a particular location. The curfew will be enforced by location monitoring. Without location monitoring, pretrial would have to call Mr. Torres every night to ensure he is home by curfew.

Neither the Government nor pretrial services oppose this request.

Thank you for your consideration.

Sincerely,

Spodek Law Group P.C.

/S/ Todd A. Spodek

TAS/az

cc: All Counsel (By ECF).
Pretrial Officer Vincent Adams (By Email).